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Attorney for Defendant

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS**

MODESTA MANGLONA NADAR,

Plaintiff,

vs.

EFREM S. TAIMANAO dba JOE &  
SON'S ENT.,

Defendant.

**CIVIL CASE NO. 07 - 0023**

**ANSWER**

COMES NOW Efrem S. Taimanao dba Joe & Son's Ent., ("Defendant") and answers  
Plaintiff's complaint as follows:

1. Defendant admits the allegations in paragraph 1 of he Complaint.
2. Defendant admits the allegations in paragraph 2 of the Complaint.
3. Defendant admits the allegations in paragraph 3 of the Complaint.
4. Defendant admits the allegations in paragraph 4 of the Complaint.
5. Defendant admits the allegations in paragraph 5 of the Complaint.
6. Defendant admits the first, second and third sentence in paragraph 6 of the Complaint. All other allegations therein are denied for lack of sufficient information to form a belief as to the truth of the allegations.
7. Defendant denies the allegations in paragraph 7 of the Complaint for lack of sufficient

1 information as to the truth of the allegations therein.

2 8. Defendant admits the allegations in paragraph 8 of the Complaint.

3 9. Defendant denies the allegations in paragraph 9 of the Complaint for lack of sufficient  
4 information to form a belief as to the truth of the allegations therein.

5 10. In response to paragraph 10 of the Complaint, Defendant incorporates the answers in  
6 paragraphs 1 through 9 above as if fully stated herein.

7 11. Defendant admits the allegations in paragraph 11 of the Complaint.

8 12. Defendant admits the allegations in paragraph 12 of the Complaint.

9 13. Defendant admits the allegations in paragraph 13 of the Complaint.

10 14. Defendant admits the allegations in paragraph 14 of the Complaint.

11 15. Defendant admits the allegations in paragraph 15 of the Complaint.

12 16. Defendant admits the allegations in paragraph 16 of the Complaint.

13 17. Defendant admits the allegations in paragraph 17 of the Complaint.

14 18. Defendant admits the allegations in paragraph 18 of the Complaint.

15 19. Defendant admits the allegations in paragraph 19 of the Complaint.

16 20. Defendant denies the allegations in paragraph 20 of the Complaint.

17 21. Defendant denies the allegations in paragraph 21 of the Complaint.

18 22. Defendant admits the allegations in paragraph 22 of the Complaint.

19 23. Defendant admits the allegations in paragraph 23 of the Complaint.

20 24. Defendant denies the allegations in paragraph 24 of the Complaint.

21 25. Defendant denies the allegations in paragraph 25 of the Complaint.

22 26. Defendant denies the allegations in paragraph 26 of the Complaint.

23 27. In response to paragraph 27 of the Complaint, Defendant incorporates the answers in  
24 paragraphs 1 through 26 above as if fully stated herein.

25 28. Defendant admits the allegations in paragraph 28 of the Complaint.

26 29. Defendant denies the allegations in paragraph 29 of the Complaint.

27 30. Defendant denies the allegations in paragraph 30 of the Complaint.

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31. Defendant denies the allegations in paragraph 31 of the Complaint.

32. Defendant denies the allegations in paragraph 32 of the Complaint.

33. Defendant denies the allegations in paragraph 33 of the Complaint.

34. Defendant denies the allegations in paragraph 34 of the Complaint.

35. Defendant denies all allegation in the Complaint not specifically admitted to herein.

Wherefore, Defendant prays for the Complaint to be dismissed for failure to state a cause of action upon which a relief may be granted, for attorney fees and costs in defending this lawsuit and for other relief as the court deems just and proper.

#### Affirmative Defenses

Defendant asserts the following affirmative defenses:

1. Plaintiff has pre-existing medical conditions.
2. Plaintiff released and waived any claim against Defendant.
3. Plaintiff has failed to name as parties to this lawsuit persons and/or entities who are indispensable parties.
4. On the first floor of the Joe & Son's building is an office space that the Immigration Services was renting. That office was specifically made available for and accessible by individuals with disabilities who wanted access to the Immigration Services.

Dated this \_\_\_\_ day of July, 2007.

/s/ Perry B. Inos  
Perry B. Inos, F0185  
Counsel for Defendant